Permanent Housing during COVID-19
Accountability Plan

On April 15th, 2020, the Chicago Continuum of Care (CoC) Board of Directors passed a policy affirming the need for providers to continue to house new households in permanent and transitional housing and requiring providers to eliminate barriers to housing.

The following accountability plan was developed with community input and approved by the System Performance and Evaluation Committee (SPEC). It documents the expectation of providers to adhere to the policy and the framework to hold them accountable. The start date for this accountability plan is Monday, May 4.

Adherence to the policy passed by the CoC Board of Directors will be used as criteria for ranking during the next NOFA cycle.

Accountability

The following data will be used to monitor adherence to expedited housing expectations and verify that projects are taking all possible measures to place participants into permanent and transitional housing while this policy is in effect. All Chicago is committed to transparency regarding how these data points will be pulled and will share this information with our partners as we move forward in this process.

- Bed utilization rates
- Need status timeliness standard (see Housing Provider Interim Contact Protocols)
- Time from match to housing
- Openings without match requests

All Chicago will also incorporate new elements into CoC Program Monitoring to verify whether programs maintain documentation on file, including but not limited to a letter sent to HUD requesting use of the waiver, documentation of the reasons the agency had for needing to use the waiver, implementation of Emergency Recordkeeping Policies, and associated client file notations.

Expectations

Below are the expectations for HUD CoC-Funded Partners to follow as we work together to expedite housing placements and lower documentation barriers during the COVID-19 public health crisis.

HUD Waivers & Recordkeeping

- Internally, each agency should consider the available HUD waivers and determine which ones will help their projects expedite the housing process. Send a notification letter to HUD indicating the waivers the agency will use.
- Maintain documentation of the letter submitted to HUD along with other required documentation, including the reasons the agency had for needing to use the waiver, implementation of Emergency Recordkeeping Policies, and associated client file notations.

Coordinated Entry

- Do not hold vacancies for isolation, quarantine, or any other reason.
- Request a match within 2 days of a new vacancy.
- Follow the Coordinated Entry Temporary Prioritization Plan and Coordinated Entry Interim Contact Protocols

Eligibility & Intake

- Standards for documenting current homelessness remain the same, although when contacting third parties for verification, the recommendation is for staff to rely completely on remote forms of contact.
- PSH: Standards for documenting a participant's length of time homeless remain the same, although when contacting third parties for verification, the recommendation is for staff to rely completely on remote forms of contact. Continue using a 180-day window to acquire documentation. Have participants self-certify their length of time homeless until third party records are obtained. If responses from other providers prove challenging due to COVID-19, utilize Emergency Recordkeeping Protocols to document attempts.
- Complete intakes over the phone or in-person with appropriate social distancing and using preventive measures. For intake paperwork, use any of the following as a temporary replacement for physical signatures: DocuSign or similar programs, collecting documentation (including photos) via email or text message, documenting verbal agreement in case notes, or other methods. Outline these procedures in the agency's Emergency Recordkeeping Policy and collect signatures when the crisis ends.
- Remove all documentation barriers during the intake process. Do not allow a lack of documentation that is normally collected, such as identification, income, background checks (required by the project), etc., to delay enrollment or housing. Help participants acquire missing documentation as soon as the opportunity is available, and it is safe to do so.

Housing

- Use the HUD waiver to enable participants to obtain units that cost more than Fair Market Rent (FMR), unless it is easy to obtain housing that is under FMR. All units must be analyzed for rent reasonableness.
- PSH: If a one-year lease is a barrier to housing, use the HUD waiver to enable participants to enter leases that are less than one year, so long as the initial term is for more than one month.
- Use centralized CoC unit list available through All Chicago as needed to quickly locate units and make connections to landlords who have established relationships with the CoC.
- Use the HUD waiver to pay for up to 6 months of rental arrears and 6 months of utility arrears when those arrears make it difficult to obtain housing.
- Use the HUD waiver to use technology for Housing Quality Standards (HQS) inspections instead of conducting them physically.
- Use DocuSign or similar programs to sign leases remotely. Use technology creatively. Accept pictures of signed leases in lieu of original documents. Outline these procedures in the agency's Emergency Recordkeeping Policy and collect documents/signatures when the crisis ends.